

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
**BIOSAFE-ONE, INC d/b/a
WWW.BIOSAFEONE.COM
and CHRISTOPHER JORGENSEN,**

Case No. 07 cv 6764 (DC) (DFE)

Plaintiffs

-against-

**ROBERT HAWKS; BRAD SKIERKOWSKI;
NEWTECHBIO, USA a/k/a BRAD & COMPANY,
INC. d/b/a WWW.NEWTECHBIO.COM; and
WWW.JUMBO MORTGAGES101.COM
A/k/a JUMBOMORTGAGES.NET; and
BCI FUNDING GROUP**

**DECLARATION OF
VIVIAN M. WILLIAMS
IN SUPPORT OF MOTION
FOR SANCTION**

Defendants
-----X

State of New York
County of New York

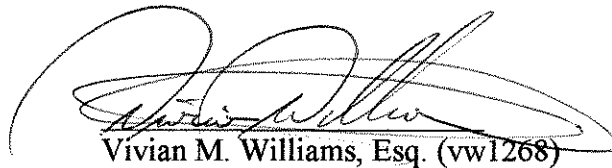
Pursuant to Title 28, Section 1746 of the United States Code, I Vivian M.

Williams, declares under penalty of perjury that to the best of my knowledge the
following statements are true:

1. The exhibits number A is a true copy of the deposition of Robert Hawks held at the office of Vivian M. Williams & associates, P.C., 14 Wall Street, 20th Floor on the 18th day of September, 2008.
2. Exhibit B is a true copy of the deposition of Brad Skierkowski held at the office of Vivian M. Williams & associates, P.C., 14 Wall Street, 20th Floor on the 18th day of September, 2008.
3. Exhibit C is a true copy of the transcript of Robert Hawks' testimony at the preliminary Injunction Hearing held on October 2, 2007.

4. Exhibit D is a true copy of the verified complaint of the above-entitled action.
5. Exhibit H is a true copy from the Pennsylvania Department of Banking website showing enforcement actions and a consent Agreement and Order in matter involving Defendants Robert Hawks and Robert Skierkowski.
6. Plaintiffs were unable to amend the complaint to include Eastern American Mortgage Company and Dana Capital Group because Defendants failed to disclose in their mandatory disclosure and or at a point in time reasonable enough for Plaintiffs to amend the complaint and pursue discovery against the additional parties.
7. Plaintiffs have been prejudiced as a direct result of Defendants' failure to fully comply with Plaintiffs' discovery requests.
8. All exhibit submitted in support of this motion are to the best of my knowledge true copies of what they purport to be and represented as herein.

Dated: New York, NY
11/14/2008



Vivian M. Williams, Esq. (vw1268)